

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

ANGELO CASTIGLIOLA

No. 1:23-cr-103-JAW

PROSECUTION VERSION

If this case were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt:

1. The defendant and K.G. were in a long-term dating relationship from approximately 2009 to 2019 that produced a minor child. M.G. is the mother of K.G. and the grandmother of the minor child.

Count One

2. From July 16, 2023 through August 3, 2023, the defendant repeatedly called, left voicemails for, and sent text messages to K.G. on her personal cell phone, during which conversation and communication ensued, with the sole purpose to harass K.G. The voicemails and text messages repeatedly alleged that K.G. was having an affair with an unnamed Portland police officer, threatened to do harm to the unnamed officer, and referenced the minor child.

3. The defendant called K.G. approximately 57 times from July 16, 2023 through August 3, 2023, resulting in at least 9 voicemails. The defendant also sent K.G. approximately 40 text messages on July 16, 2023.

4. All of the calls, voicemails, and text messages to K.G. were sent from a phone number that K.G. knows to belong to the defendant and in fact belongs to the defendant. K.G. also recognized the voice on the voicemails as that of the defendant.

5. K.G. lives in Maine and was in Maine when she received the communications.

Count Two

6. On July 28, 2023, the defendant repeatedly called M.G. on her personal cell phone. M.G. did not answer any of these calls. One of the calls was made from the phone number that M.G. knows to belong to the defendant and in fact belongs to the defendant, but the remainder of the calls were from phone numbers not familiar to M.G. To place these calls, the defendant used Telnix, a secondary phone number application that allows users to assign secondary phone numbers to their true phone number.

7. The defendant left at least two voicemails for M.G. on July 28, 2023 that were threatening in nature. In one voicemail, the defendant stated that he was “going to murder” M.G.’s three daughters (including K.G.) and that he was “going to rape” M.G.’s two granddaughters, who are minors. The defendant made these threats knowingly and willfully. The other voicemail was similar in substance and tone.

8. M.G. lives in Maine and was in Maine when she received the communications.

9. During the entirety of the relevant time period described above, the defendant was traveling outside the District of Maine. Therefore, each communication was made in interstate commerce.

Date: August 22, 2024

Respectfully Submitted:

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/s/ Shira Furman

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2024, I electronically filed the foregoing **PROSECUTION VERSION** using the CM/ECF system which will send notifications of such filing(s) to all counsel of record.

DARCIE N. MCELWEE
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by: /s/ Grace Herrick
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